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August 6, 2021

## **VIA ECF**

The Honorable Leda Dunn Wettre, U.S.M.J United States District Court District of New Jersey Martin Luther King Building & U.S. Courthouse 50 Walnut Street Newark, NJ 07102

> Re: <u>CommScope, Inc. v. Rosenberger Technology (Kunshan) Co. Ltd., et al.</u> Civil Action No. 2:19-cv-15962-JXN-LDW

Dear Judge Wettre:

This firm and Faegre Drinker Biddle & Reath LLP represent CommScope, Inc. ("CommScope") in the above-referenced matter. This letter is sent on behalf of both CommScope and the Rosenberger defendants regarding CommScope's July 29, 2021 letter brief requesting an order to compel Rosenberger to produce additional discovery. (Dkt. 439.)

CommScope and Rosenberger have conferred and have agreed to present for the Court's consideration the following briefing and deposition schedule to address the issues set forth in CommScope's letter:

- Rosenberger will have the opportunity to depose CommScope's expert, Dr. van der Weide, for 3.5 hours on <u>August 13, 2021</u>.
- Rosenberger will submit its opposition letter brief by <u>Tuesday</u>, <u>August 17</u>.
- If Rosenberger relies on an expert declaration in its opposition letter brief, CommScope will be allowed to depose Rosenberger's expert for 3.5 hours on <u>Thursday, August 19</u>, and submit a request to file reply papers by <u>Tuesday</u>, <u>August 24</u>.
- If Rosenberger does not rely on an expert declaration, CommScope will submit a request to file reply papers by Friday, August 20.
- Rosenberger will not object to CommScope's request to file reply papers.



Norris McLaughlin, P.A.

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If this briefing schedule is acceptable to Your Honor, the parties respectfully request that Your Honor "so order" this letter submission. Please do not hesitate to contact me with any questions.

Respectfully submitted,

**NORRIS McLAUGHLIN, P.A.** 

/s/ Edward G. Sponzilli Edward G. Sponzilli